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Attorneys for Federal Defendants.

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CALIFORNIA COALITION FOR WOMEN
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;
G.M.; A.S.; and L.T., individuals on behalf of
themselves and all others similarly situated,

Plaintiffs

v.

UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS, a governmental entity;
BUREAU OF PRISONS DIRECTOR
COLETTE PETERS, in her official capacity;
FCI DUBLIN WARDEN THAHESHA JUSINO,
in her official capacity; OFFICER
BELLHOUSE, in his individual capacity;
OFFICER GACAD, in his individual capacity;
OFFICER JONES, in his individual capacity;
LIEUTENANT JONES, in her individual
capacity; OFFICER LEWIS, in his individual
capacity; OFFICER NUNLEY, in his individual
capacity; OFFICER POOL, in his individual
capacity; LIEUTENANT PUTNAM, in his
individual capacity; OFFICER SERRANO, in
his individual capacity; OFFICER SHIRLEY, in
his individual capacity; OFFICER SMITH, in his
individual capacity; and OFFICER VASQUEZ,
in her individual capacity,

Defendants.

CASE NO. 4:23-CV-04155-YGR


DECLARATION OF ABBIE CZIOK

FILED UNDER SEAL

1 I, NAME, declare as follows:

- 2 1. My name is Abbie Cziok, and I am an attorney of record in the above captioned case representing
3 the United States.
- 4 2. On January 17, 2024, I contacted counsel for Plaintiffs to ask if they could stipulate to filing medical
5 records, sensitive institution management, and other private information under seal.
- 6 3. I have not received a response from counsel.

7
8 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and
9 correct. Executed this 16th day of February 2024, at Helena, MT.

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12 ABBIE CZIOK
13 Assistant United States Attorney
14 District of Montana
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